

**Stakeholder Comments on:
CAISO Data Release Phase 3 Draft Final Proposal**

| Submitted by | Company | Submitted Date |
|-------------------------|----------------------------|-----------------------|
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Southern California Edison "SCE" appreciates the opportunity to participate in the *Data Release & Accessibility* stakeholder process and to submit the following comments on the CAISO's Draft Final Proposal for Data Release Phase 3, dated February 17, 2011.

SCE supports the CAISO's release of the following market model data as proposed in the Draft Final Proposal:

1. Hourly day-ahead Load Distribution Factors (LDFs) on the trade day plus 3 days.
2. Day-ahead (hourly), HASP (15-minute), and real-time (5-minute) shift factors by binding constraint on the trade day plus 3 days.
3. Transmission limits enforced in the day-ahead and real-time markets on the trade day plus 3 days. For real-time markets, SCE requests the CAISO release transmission limits enforced in HASP (15-minute), RTPD (15-minute) and RTD (5-minute) if the CAISO enforcement practice is such that the limits enforced in the separate real-time market processes are not required to be same.
4. Aggregated generation outage data at trading hubs under three fuel categories: thermal, hydro, and renewable.
5. CRR Bid data for auctions going forward after Tariff approval date.
6. Wind and solar aggregated forecasting data at trading hubs.

In the Draft Final Proposal, it is stated that CAISO is unable to provide "TO/FROM Bus" information in its transmission outage report due to implementation challenges. As stated previously, SCE supports the CAISO to add this information when such information is available, with the stipulation that no additional reporting obligations are imposed on the Transmission Owners in order to make this information available. Regarding the posting time, SCE supports more frequent updates of its transmission outage report and supports the CAISO evaluating the feasibility to have its transmission outage report updated on an hourly basis.

Regarding the posting time of transmission limits for internal paths, SCE feels the CAISO's proposal to release this information on the trade day plus 3 days is appropriate, considering

market power mitigation concerns due to the fact that Competitive Path Assessment (CPA) studies are performed on a quarterly basis today. However, SCE supports that CPA studies be performed on a more frequent basis to allow more dynamic market power mitigation and reflect actual system conditions. Should this be implemented, SCE believes the CAISO should reconsider a more timely release of the transmission limit information. Additionally, SCE supports the DMM's recommendation that the CAISO's policy explicitly state that the data release be suspended or delayed if any market power mitigation concerns ever materialize.

Regarding VER forecasting data, as stated previously, SCE supports the CAISO releasing the wind and solar forecasting data by trading hub. However, SCE believes that the core costs of forecasting the VERs output should flow back to the VERs. If individual projects desire or require project specific forecasts, then they should pay the additional costs of providing these forecasts. Also, if there are incremental costs of releasing the aggregate forecast to the market, then the market should only pay these incremental costs and not the core forecasting costs.

SCE would like to take this opportunity to reiterate its position on release of the day-ahead full network model (i.e. PSS/E raw files). As stated in its previous comments, SCE believes the release of this information will greatly enhance the market efficiency in general. The lack of "TO/FROM Bus" information in the transmission outage report and the AC convergence issue observed under convergence bidding makes the release of day-ahead full network model more imperative. As noted by SCE, other ISOs release even more granular network & commercial models. For example, MISO releases EMS model in PSS/E format on a daily basis¹. ERCOT releases Network Operations Model in CIM format before the day ahead market runs². Due to these reasons, SCE requests the CAISO to include the release of the day-ahead full network model in the scope of Data Release Phase 3.

¹ Midwest ISO releases network & commercial models on its OASIS (Restricted Access). The network data are in PSS/E format and updated quarterly, daily and real-time depends on the use of the data. Please see details on Page 17 of the presentation accessible from the following link:
<https://www.midwestiso.org/Library/Repository/Meeting%20Material/Stakeholder/FTRWG/2010/20100804/20100804%20FTRWG%20Item%2008%20Overview%20of%20MISO%20Models.pdf>

² No later than 0600 in the Day-Ahead, ERCOT posts the Network Operations Model that includes known transmission line outages. Please refer to the ERCOT day-ahead market information posting requirements in ERCOT Nodal Protocol 4.2.3, accessible from the following link:
<http://www.ercot.com/mktrules/nprotocols/current>